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GROOM LAW GROUP

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

APR 08 2019

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KEVIN ELLISON,

Defendant,

and

NFL PLAYER SECOND CAREER
SAVINGS PLAN,

Garnishee.

No. 2:12-CR-00072-LRS

ANSWER AND DECLARATION OF
GARNISHEE

I am the above-named Garnishee or authorized by the Garnishee to make this declaration on Garnishee's behalf, regarding the Writ of Garnishment.

On, April 1, 2019, Garnishee was served with the Writ of Continuing Garnishment. Further, the Garnishee hereby files this Answer in accordance with 28 U.S.C. § 3205.

1. DESCRIPTION OF GARNISHEE: Garnishee files this Answer as:
(check those that apply)

- ☐ An Individual
- ☐ In my personal capacity
- ☐ Doing business as,

Name of d/b/a:
Address:
Phone Number:

☐ A Partnership; and Garnishee is:

☐ A general partner

☐ A limited partner

Name of Partnership:

Address:

Phone Number:

~~XXXXX Corporation~~ A tax-qualified profit sharing plan

Name of Corporation: NFL Player Second Career Savings Plan

Affiant's Official Title: Counsel to the plan

Address: 200 St. Paul Place, Suite 2420, Baltimore, MD 21202

Phone Number: 800-638-3186

State of Incorporation: n/a

Principal Place of Business: (address above)

2. **PRIOR GARNISHMENTS:** None

For each previous garnishment involving the Defendant which is still in effect, please provide the following information:

Name of Plaintiff/Garnishor:

Date of Garnishment:

Property Subject to the Previous Garnishment:

Date of Termination:

3. **DESCRIPTION OF PROPERTY IN WHICH THE DEFENDANT HAS AN INTEREST:**

Garnishee states as follows: (check those that apply)

☐ For the pay period in effect on the date the Writ of Garnishment was served, Defendant was not in my/our employ.

☐ From the date the Writ of Garnishment was served to the date this Answer is being prepared, Garnishee has **not** had possession, custody or control of any property in which Defendant and/or the Estate of Defendant has an interest and is in no manner and upon no account indebted or under liability to Defendant and/or the Estate of Defendant.

~~XXX~~ Garnishee has possession, custody or control of the following non-earnings property in which Defendant and/or the Estate of Defendant has an interest:

Description of Property: Defined Contribution Retirement Plan Account

Approximate Value of Property: \$80,247.23 as of 4/1/2019

Defendant's and/or the Estate of Defendant's Interest in the Property: 100% / Estate

☐ Garnishee anticipates having future possession, custody or control of the following non-earnings property in which Defendant and/or the Estate of Defendant will have an interest:

Description of Property:

Approximate Value of Property:

Defendant's Interest in the Property:
When Defendant Will Acquire An Interest in the Property:

4. **GARNISHEE'S CLAIMS:** None

Garnishee makes the following claims: (check those that apply)

☐ Garnishee makes the following claim of exemption on behalf of Defendant and/or the Estate of Defendant:

Amount of Exemption:

Nature of Exemption:

☐ Garnishee has the following objections, defenses, or set-offs against the United State's right to seek garnishment of Defendant's and/or the Estate of Defendant's non-exempt property in Garnishee's possession, custody or control:

(describe nature of objection, defense, or set-off)

5. **CERTIFICATE OF SERVICE**

Garnishee certifies that it has served a copy of this Answer on:

XX Clerk of Court
United States District Court
Post Office Box 1493
Spokane, WA 99210-1493

Date of Service: April 2, 2019 / By regular mail at address above
Method of Service: (include address if service was by mail)

and

XX Estate of Kevin Ellison
c/o Chris Ellison
6242 Westchester Parkway, Ste. 240
Los Angeles, CA 90045

Date of Service: April 2, 2019 / By regular mail at address above
Method of Service: (include address if service was by mail)

and

XX United States Attorney's Office
Attn: Financial Litigation
Post Office Box 1494
Spokane, WA 99210-1494

Date of Service: April 2, 2019 / By regular mail at address above
Method of Service: (first class, certified or priority mail)

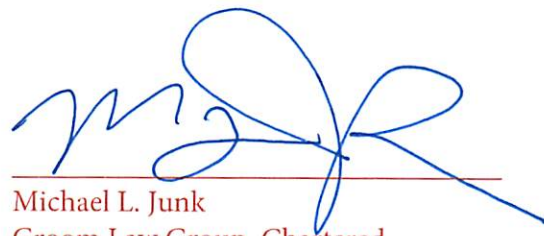
1 Garnishee declares under penalty of perjury that the foregoing is true and
2 correct.

3 PREPARED BY: Michael L. Junk, Groom Law Group, Chartered
4 1701 Pennsylvania Ave. NW, Washington DC 20006

5 TITLE: Counsel to the NFL Player Second Career Savings Plan

6 TELEPHONE NUMBER: 202-861-5430

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10 Dated: April 2, 2019

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12 Michael L. Junk
13 Groom Law Group, Chartered
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